



Douglas B. Lipsky - Partner

420 Lexington Avenue, Suite 1830
New York, New York 10170
Main: 212.392.4772
Direct: 212.444.1024
Fax: 212.444.1030
doug@lipskylowe.com

www.lipskylowe.com

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VIA ECF

The Honorable Steven M. Gold, U.S.M.J.
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Fischler v. Numen Fashion LLC, 1:20-cv-3893 (AMD)(SMG)

Dear Magistrate Judge Gold:

This firm represents Plaintiff Brian Fischler in this website accessibility case under the Americans with Disabilities Act, New York State Human Rights Law and New York City Human Rights Law. We submit this letter to respectfully request an extension of the deadline to serve the Defendant and to update the Court on this matter's status.

As background, the Summons and Complaint were issued in this matter on August 24, 2020. On August 26, the pleadings were sent to Plaintiff's process server to serve the Defendant at its North Bergen, New Jersey address. As of October 19, we had not heard back from the process server on whether service was successful and inquired on its status but did not hear back. On November 24, we followed up again on the status of serving the Defendant and learned that service was unsuccessful because the provided address is a postal center. We, upon learning this, promptly directed our process server to perform a corporate search to identify a new address where to serve the Defendant, and we expect the results of that search any day. Plaintiff, accordingly, respectfully requests a 30-day extension for Plaintiff to serve the Defendant as good cause exists for this extension. *See Maitland v. Lunn*, 1:14-cv-5938 (JS)(AKT), 2017 U.S. Dist. Lexis 40467, at * 16 (E.D.N.Y. Mar. 21, 2017) (explaining good cause exists to extend the deadline to serve a complaint if the delay is due to circumstances outside of plaintiff's control).

We greatly appreciate the Court's consideration of this request.

Respectfully submitted,
LIPSKY LOWE LLP

s/ Douglas B. Lipsky
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